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October 13, 2000

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

In Re: *Generic Docket to Establish UNE Prices for Lines Sharing per FCC 99-355, and
Riser Cable and Terminating Wire as Ordered in TRA Docket 98-00123.*
Docket No. 00-00544

Dear David:

Please find enclosed the original and thirteen copies of the Second Set of Interrogatories and Second Request for Production of Covad Communications Company to BellSouth Telecommunications, Inc. in the above-captioned proceeding.

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:



Henry Walker

HW/nl
Attachment
c: Parties

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

In Re:)
Generic Docket to Establish UNE Prices for)
Line Sharing Per FCC 99-355, and Riser Cable) Docket No. 00-00544
And Terminating Wire as Ordered in TRA)
Docket 98-00123)

**COVAD COMMUNICATIONS COMPANY'S SECOND SET OF INTERROGATORIES
AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

DIECA Communications, Inc., d/b/a Covad Communications Company ("Covad"), hereby serves its Second Set of Interrogatories and Second Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth") in writing, under oath.

Please provide the name, address and relationship to BellSouth of each person providing answers to the following interrogatories, and identify which question(s) each person answered.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc, its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
2. The terms "you" and "your" refer to BellSouth.
3. "Cost Study," "Cost Studies," "Cost Model," and "Cost Models" refer to the "recurring cost studies," including all study summaries, work papers, study inputs and supporting documentation filed by BellSouth in this proceeding.
4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
5. The term "document" shall have the broadest possible meaning under applicable

law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

7. "And" or "or" as used herein shall be constructed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information that would not otherwise not be brought within their scope.

8. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

9. “Identify” or “identifying” or “identification” when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

10. “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

11. “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;

- f) the identify of each person to whom it was sent;
- g) the identify of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is not longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

INTERROGATORIES

1. Please explain in detail the tasks involved with the dark fiber cost study input for installation and maintenance – special services (SSIM) for connection, testing, and service orders, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

2. Please explain in detail the tasks involved with the dark fiber cost study input for central office installation and maintenance circuit and facilities (NTEL) for connection, testing, and service orders, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

3. Please explain in detail the tasks involved with the dark fiber cost study input for installation and maintenance – special services (travel) (SSIM), for connection and testing,

and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

4. Please explain in detail the tasks involved with the dark fiber cost study input for access customer advocate center (UNEC) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

5. Please explain in detail the tasks involved with the dark fiber cost study input for customer point of contact (LCSC) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

6. Please explain in detail the tasks involved with the dark fiber cost study input for circuit provisioning group (CPG) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

7. Please explain in detail the tasks involved with the dark fiber cost study input for outside plant engineering (FG30), for engineering and service inquiry, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

8. Please explain in detail the tasks involved with the dark fiber cost study input for network and engineering planning (FG20) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

9. Please explain in detail the tasks involved with the dark fiber cost study input for complex resale support group (CRSG) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

10. Please explain in detail the tasks involved with the dark fiber cost study input for circuit capacity management (CCM) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

11. Please explain in detail the difference between outside plant engineering and network & engineering planning tasks for dark fiber.

12. Please explain in detail how BellSouth arrived at the life of the cost element as 52 months for dark fiber.

13. Please explain in detail why all dark fiber LCSC work times are manual.

14. Please describe in detail the process by which BellSouth makes dark fiber UNEs available to CLECs. Your complete response will include the manner of interconnection, the ordering and provisioning process, and any other processes BellSouth must undertake to make dark fiber available.

15. In 1999, how many service orders for BellSouth's retail services in Tennessee (i.e., non-UNEs or resale facilities) required conditioning activities to provision?

16. How many BellSouth service orders pertaining to BellSouth's retail services does BellSouth anticipate will require conditioning activities? Please provide this information for the following timeframes: 2000, 2001, and 2002.

17. Please provide the number of these circuits whereby a service order was issued

for purposes of undertaking conditioning activities.

18. Please provide the total number of ISDN-PRI circuits sold by BellSouth in Tennessee in 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date).

19. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

20. Please provide the total number of ISDN-BRI circuits sold by BellSouth in Tennessee in 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date).

21. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

22. Please provide the total number of T-1 or DS-1 circuits sold by BellSouth in Tennessee in 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date).

23. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

24. Please provide the total number of digital circuits below T-1 capacity (e.g., 64 kbps, 56 kbps, etc.) sold by BellSouth in Tennessee in 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date).

25. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

26. Please provide the total amount of expense BellSouth booked for conditioning activities (i.e., removing load coils, removing bridged tap or removing repeaters and/or other devices disruptive to digital services) in 1998, 1999, and year to date 2000.

27. How many load coils are currently placed in BellSouth's Tennessee network?

28. How many of the load coils identified in response to the question above are

housed in underground, manhole environments?

29. Please admit or deny that BellSouth's employees in Tennessee utilize electronic maps of BellSouth's facilities in performing their job functions.

30. If the answer to the question above is anything other than an unequivocal "Deny," please list each such database used by BellSouth's employees. Your complete answer will include a description of each database and the primary function it serves for BellSouth's employees.

31. Do BellSouth's outside plant technicians have remote, electronic access to any BellSouth database that includes maps of BellSouth's outside plant facilities?

32. If the answer to the question above is anything other than an unequivocal "No," please list each such database which can be accessed by BellSouth's outside plant technicians remotely. Your complete answer will include a description of each database and the function it serves for BellSouth's employees.

33. BellSouth's proposed rates in this proceeding include a "Manual Loop Makeup" charge. Does BellSouth, in the derivation of its "Manual Loop Makeup" charge, assume that a BellSouth engineer will review BellSouth outside plant information (for purposes of assessing the relevant loop makeup data), using an electronic version of BellSouth's outside plant maps (or "plats"), paper versions of BellSouth's "plats," or some other method? If some other method is assumed, please explain that method in detail.

34. When a CLP requests loop makeup information on a loop whose information is not currently included in the Loop Facilities Assignment Control System (LFACS) and Manual Loop Makeup activities are required (and a Manual Loop Makeup charge is assessed), is the information obtained from that Manual Loop Makeup inquiry then entered

into LFACS such that that loop can be accessed via the mechanized loop makeup process in the future?

35. Please describe in detail the exact technical specifications for the UCL loop.

36. Please describe in detail which services the UCL loop is guaranteed to support.

37. Please describe in detail how BellSouth created the technical specification for the UCL loop, how those specifications were revealed to the CLECs, and what opportunity CLECs had, or currently have, to request changes to those technical specifications.

38. Please admit or deny that all UCL loops in Tennessee meet the technical specifications for SL1 voice grade loops.

39. If response to number 39 above is anything but an unequivocal “admit,” please explain in detail how a loop that meets BellSouth’s technical specifications for a UCL loop would not also meet BellSouth’s technical specifications for a SL1 voice grade loop.

40. Please describe in detail the exact technical specifications for the ADSL loop.

41. Please describe in detail which services the ADSL loop is guaranteed to support.

42. Please describe in detail how BellSouth created the technical specification for the ADSL loop, how those specifications were revealed to the CLECs, and what opportunity CLECs had, or currently have, to request changes to those technical specifications.

43. Please admit or deny that all ADSL loops in Tennessee meet the technical specifications for SL1 voice grade loops.

44. If response to number 43 above is anything but an unequivocal “admit,” please explain in detail how a loop that meets BellSouth’s technical specifications for an ADSL loop would not also meet BellSouth’s technical specifications for a SL1 voice grade loop.

45. Please describe in detail the exact technical specifications for the HDSL loop.

46. Please describe in detail which services the HDSL loop is guaranteed to support.
47. Please describe in detail how BellSouth created the technical specification for the HDSL loop, how those specifications were revealed to the CLECs, and what opportunity CLECs had, or currently have, to request changes to those technical specifications.
48. Please admit or deny that all HDSL loops in Tennessee meet the technical specifications for SL1 voice grade loops.
49. If response to number 48 above is anything but an unequivocal “admit,” please explain in detail how a loop that meets BellSouth’s technical specifications for an HDSL loop would not also meet BellSouth’s technical specifications for a SL1 voice grade loop.
50. Please identify BellSouth’s subject matter expert(s) for line sharing operation support systems updates, including the person(s) who can explain with specificity the cost of the project, the type of upgrades required, the functionality of the upgrades, the work activities necessary to complete the upgrades, the work activities necessary to maintain the upgrades, the type of employees/consultants BellSouth will use for completing and maintaining the upgrades, and the extent to which these upgrades benefit other BellSouth operations (including retail) or UNE products other than line sharing.
51. Please describe in detail any additional costs associated with BellSouth’s use of the bantam test jack for CLEC line sharing splitters, including the specific amount of additional costs, where those costs are found the line sharing cost study, and the work activities and personnel associated with those costs.
52. Please provide the percentage failure rate BellSouth has experienced with line sharing splitter cards.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please provide copies of the following documents pertinent to BellSouth's most recent fiber placement projects in the state of Tennessee:

- Requests for Proposals (RFPs) submitted to telecommunications contractors who provide BellSouth construction services.
- Copies of the RFP that was accepted.
- Copies of any contract or agreement that governed the project including any documents that detailed the rates, terms and conditions by which the chosen contractor would provide BellSouth services pertinent to the project.

2. For each of the 5 most recent projects for which information is provided in response to the request above, please provide documentation detailing any amount of BellSouth engineering or other labor that was expended on each project.

3. Please describe in detail the process by which BellSouth makes dark fiber UNEs available to CLECs. Your complete response will include the manner of interconnection, the ordering and provisioning process, and any other processes BellSouth must undertake to make dark fiber available.

4. Please provide any documentation provided to BellSouth's employees explaining the BellSouth Corporate Facilities Database or any other database that houses electronic maps of BellSouth's outside plant facilities in Tennessee.

5. Please provide BellSouth's five most recent invoices for purchasing 96-port line sharing splitters.

6. Please provide a copy of any contract or agreement that governs the rates, terms, and/or conditions by which BellSouth purchases the splitter equipment discussed in the question above.

7. To the extent the invoices would differ, please provide BellSouth's five most

recent invoices for purchasing splitters used by BellSouth to provision its FastAccess DSL service or any other retail/wholesale ADSL offering.

8. Please provide a copy of any contract or agreement that governs the rates, terms, and/or conditions by which BellSouth purchases the splitter equipment discussed in the question above.

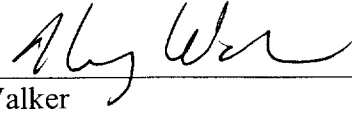
9. Please provide copies of any BellSouth internal capital budget documentation wherein capital is budgeted toward facilitating CLEC line sharing arrangements. Your complete answer will include any internal memorandums, any notes from Board Meetings, or any email discussions wherein capital was budgeted, or budgeted capital was anticipated, to meet BellSouth's obligations pursuant to the FCC's Line Sharing Order.

10. Please provide any and all agreements in effect within the past 4 years, between BellSouth and any telecommunications contractor relating to the placement, rearrangement, repair, removal or provisioning of outside plant facilities.

11. Please provide copies of any collective bargaining agreements, other employment agreements, or other documents that detail the terms, conditions, or rules by which BellSouth employees undertake the placement, rearrangement, repair, removal or provisioning of outside plant facilities, including specifically any such documents which prohibit anyone other than a BellSouth employee from performing these tasks.

Dated: October 13th, 2000

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Walker", written over a horizontal line.

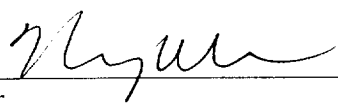
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CERTIFICATE OF SERVICE

I do hereby certify that I have this 13th day of October, 2000 served a true and correct copy of the foregoing via facsimile* and/or United States Mail to the following parties of record:

Guy M. Hicks BellSouth Telecommunications, Inc. 333 Commerce Street Suite 2101 Nashville, TN 37201-3300	James B. Wright United Telephone 14111 Capital Boulevard Wake Forest, NC 27587-5900	Clay Arendes Vectris Telecom, Inc. 6500 River Place Blvd. Building 2, Suite 200 Austin, TX 78730
James P. Lamoreux AT&T 1200 Peachtree Street NE Room 4060 Atlanta, GA 30309	Charles B. Welch, Jr. Farris, Mathews, Branan, Bobango & Hellen 618 Church Street Suite 300 Nashville, TN 37219	T.G. Pappas R. Dale Grimes Bass, Berry & Sims 315 Deadrick Street Suite 2700 Nashville, TN 37238-002
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Henry Walker